

# Developing Written Plans, Procedures and Guidance

## GCSA Employee Training

Tulsa Mohawk Education Auditorium

November 17, 2015

Richard Smith, INCOG Contractor

# Written Stuff? Say What?

- Surprise, surprise... most of these requirements and recommendations have always been in OKR04.
- So many, in fact, that it was pointless to tease out the new from the old.
- So why is it an issue now? Blame the Audits !
- ODEQ found one of the greatest deficiencies was lack of written plans, procedures and guidance.
- No more “sliding” – ODEQ recently said, *“If it says to have it in writing in the permit, then we will ask to see it.”*

# Why Write It Down?

- There are significant benefits to having documentation about procedures:
  - Help in training existing staff.
  - Consistency in getting the job done a certain way.
  - Operational efficiency.
  - Identifying deficiencies and need for improvement.
  - Transferring knowledge to future operators.
  - Demonstrating professionalism.
- OKR04 and ODEQ offer great flexibility in how you comply.

# The Basics

- See the GCSA Fact Sheet for a comprehensive summary.
- INCOG identified 43 references in OKR04 to have some type of written plan, procedures or guidance.
- Many references in OKR04 were indirect, such as:
  - “you need to document in your SWMP”,
  - “you must review and revise your ... program”, or
  - “develop, implement and enforce requirements for ...”
- Many only applied to certain circumstances, such as addressing 303(d), ARC, the 7<sup>th</sup> MCM, etc.

# INCOG's GCSA Support

- Start with the November 2015 GCSA Fact Sheet.
- GCSA Employee Training workshops.
- Stormwater Management Program (SWMP) template.
- Standard Operating Procedures (SOP) template.
- Group and individual help with very formal documents:
  - Quality Assurance Project Plan (QAPP).
  - Spill Response and Prevention Plan (SRPP).
- Continuing GCSA education on resources and trends.

# Breaking the Confusion

- INCOG performed word searches on a dozen key terms, such as “plan”, “procedures”, “document”, “written”, etc.
- Results were summarized in the November 2015 Fact Sheet.
- Found that all 43 could be categorized in 3 ways:
  - **Plan** – the most formal, lengthy and complex.
  - **SOP** – systematic means of preparing procedures.
  - **Guidance** – least formal (memo, email, directive, etc.).
- Also categorized the 43 by type of Action: “Requirement” versus “Recommendation” in OKR04.

# Circumstances – When Needed

- Many references in OKR04 applied to all permittees as being required. (these are in **red font** in the Fact Sheet).
- Most were required for only certain circumstances:
  - **303(d)** – “you must develop a plan”
  - **ARC** – “an Emergency Response Plan must be included”
  - **7<sup>th</sup> MCM** – “develop a supplemental BMP action plan”
  - **New MS4 Areas** – “must have a plan for implementing your SWMP on all new affected areas”
  - **ODEQ Action** – “DEQ will notify you... must document these actions in the SWMP.”

# How To Proceed

1. Organize your approach. Start with the big picture.
2. Identify high priority ones to do first.
3. Schedule the rest over the life of your 5-year permit.
4. Many “procedures” can be simple text inserted in the SWMP, or in-house emails or directives.
5. Don’t cram everything in the SWMP; use separate documents.
6. Seek outside resources: ODEQ, INCOG, internet.
7. Simple is best – stay focused on necessities only.



# Caring For Your Procedures

- They need frequent attention and upkeep.
- USE THEM! Make notes in margins, use sticky tabs, keep track of needed changes, and update as needed.
- Employee training on procedures is required in OKR04; written procedures are essential for this.
- Show in each document the date of latest revision.
- Keep them organized, easy to locate, centralized.
- Best as electronic files for future editing and emailing.
- When in doubt, contact ODEQ. Also contact INCOG so that we can pass on new information to other GCSA members.

# Flexibility

- ODEQ will be very flexible by allowing each MS4 to develop their procedures to best suit local resources and conditions.
- Priorities and perspectives will shift over the coming years. Lessons learned...
- Ask questions of ODEQ, INCOG, other MS4s.
- Share templates, drafts, concepts, ideas, strategies, and ask INCOG to address issues in GCSA member meetings and training workshops.
- Make progress – don't put off, start simple and work towards an ultimate goal.

# Thank you. Any Questions ?



Richard B. Smith

INCOG

(918) 579-9450

[rsmith@incog.org](mailto:rsmith@incog.org)

